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Of Attorneys for Defendant
Allied Insurance Company of America

UNITED STATES DISTRICT COURT
 DISTRICT OF OREGON
 PORTLAND DIVISION

SHARON M. JEWETT, in her capacity as trustee of MICHAEL R. JEWETT REVOCABLE LIVING TRUST, MICHAEL R. JEWETT, in his capacity as trustee of MICHAEL R. JEWETT REVOCABLE LIVING TRUST, MICHAEL R. JEWETT, MICHAEL R. JEWETT and SHARON M. JEWETT,)	Case No.
)	
)	DEFENDANT ALLIED INSURANCE COMPANY OF AMERICA'S NOTICE OF REMOVAL AND DEMAND FOR JURY TRIAL
)	
)	
Plaintiffs,)	
)	
vs.)	
)	
SCOTTSDALE INSURANCE COMPANY, and ALLIED INSURANCE COMPANY OF AMERICA,)	
)	
)	
Defendants.)	

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, Defendant Allied Insurance Company of America, hereinafter "Allied Insurance" hereby removes this action from the Circuit Court of the State of Oregon For the County of Multnomah to the United States District Court for the Portland Division of the United States District Court.

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NOTICE OF REMOVAL IS TIMELY

1.
1.
1.

Allied Insurance is a party in a civil action brought against it in the Circuit Court of the State of Oregon for the County of Multnomah entitled: *Sharon M. Jewett, Michael R. Jewett Revocable Living Trust, Michael R. Jewett v. Scottsdale Insurance Company, and Allied Insurance Company of America*. A copy of the Summons and Complaint in that action is attached to this Notice as Exhibit 1).

2.

The state court action was commenced when the Complaint was filed with the Circuit Court of the State of Oregon for the County of Multnomah, on or about April 16, 2018. The Complaint purports to state claims for breach of contract against both defendants. Allied Insurance, through its counsel, accepted electronic service of the Complaint and Summons on April 18, 2018. (A copy of the confirmation of service is attached as Exhibit 2).

3.

Plaintiff's Complaint alleges \$245,280.00 in damages.

4.

Pursuant to 28 U.S.C. § 1446(b)(3), except as provided under subsection (c), if the case stated by the initial pleading is not removable, a notice of removal may be filed within thirty days after receipt by the defendant, through service or otherwise, of a copy of an amended pleading, motion, order or other paper from which it may first be ascertained that the case is one which is or has become removable.

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DIVERSITY JURISDICTION EXISTS

6.

Plaintiffs are citizens of the State of Oregon. Allied Insurance is domiciled in Ohio with its principal place of business in DeMoines, Iowa. Co-Defendant Scottsdale Insurance company is domiciled in Ohio with its principal place of business in Scottsdale, Arizona.

7.

This is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1332. Allied Insurance may remove this matter pursuant to the provisions of 28 U.S.C. §§ 1441 and 1446 because the amount in controversy exceeds the sum of \$75,000.00 and complete diversity exists.

REMOVAL TO THIS DISTRICT IS PROPER

8.

Pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, removal of the above-captioned state court action to this Court is appropriate. 28 U.S.C. § 1446(b)(3)

9.

Pursuant to 28 U.S.C. § 1441(a), removal is made to this Court as the district embracing the place where the state action is pending.

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10.

Allied Insurance is providing the Plaintiff, through their counsel of record, written notice of the filing of this Notice of Removal. Furthermore, Allied Insurance is filing a copy of this Notice with the Circuit Court of the State of Oregon For the County of Multnomah.

DATED: May 3, 2018.

THENELL LAW GROUP, P.C.

/s/ Daniel E. Thenell

By: _____

Daniel E. Thenell, WSB No. 37297

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Of Attorneys for Defendant

Allied Insurance Company of America

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 3, 2018, I served the foregoing
**DEFENDANT ALLIED INSURANCE COMPANY OF AMERICA'S NOTICE OF
REMOVAL AND DEMAND FOR JURY TRIAL** on:

Anthony L. Reiner
Maloney Lauersdorf Reiner, P.C.
1111 E. Burnside Street, Suite 300
Portland, OR 97214
Email: tr@mlrlegalteam.com
Of Attorney for Plaintiffs

_____ by electronic means through the Court's Case Management/Electronic Case Filing system
on the date set forth above.

_____ by mailing a full, true and correct copy thereof in a sealed, first-class postage-prepaid
envelope, addressed to the attorney as shown above, the last-known office address of the
attorney, and deposited with the United States Postal Service at Portland, Oregon on the
date set forth above.

 X by emailing to each of the foregoing a copy thereof to the last known email address shown
above.

THENELL LAW GROUP, P.C.

/s/ Daniel E. Thenell
By: _____
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